

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
)	
Plaintiffs and)	C.A. No. 20-613 (SB)
Counterdefendants,)	
)	
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**DECLARATION OF MIRANDA D. MEANS IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANT’S MOTION FOR CERTIFICATION FOR
INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(B)
AND FOR STAY PENDING APPEAL**

I, Miranda D. Means, Esq., declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, counsel of record for Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively, “Plaintiffs”). I am admitted and in good standing to practice law in the states of Massachusetts and New York, and I am admitted *pro hac vice* to practice in this District for the above-captioned case. I submit this declaration in support of Plaintiffs’ Opposition to Defendant’s Motion for Certification for Interlocutory Appeal Under 28 U.S.C. § 1292(B) and for Stay Pending Appeal. The statements set forth in this declaration are based on my personal knowledge and my review of the contemporaneous documents referenced and attached hereto.

2. On March 11, 2025 counsel for Plaintiffs and counsel for Defendant conferred regarding whether Defendant intends to argue factual disputes precluding summary judgment and counsel for Defendant indicated that they may.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 1st day of April, 2025.

A handwritten signature in blue ink, appearing to read 'MD Means', is positioned above a horizontal line.

Miranda D. Means

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on April 1, 2025, upon the following in the manner indicated:

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/s/ Michael J. Flynn

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